

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**SILVER STEER, INC., d/b/a Zona Rosa  
Nightclub,**

**Plaintiff,**

**V.**

**THE CITY OF CLANTON,  
ALABAMA,**

**Defendant.**

**Civil Action No.: 2:08CV136-MEF**

# AFFIDAVIT

**STATE OF ALABAMA**

**COUNTY OF JEFFERSON**

Comes now the undersigned and being first duly sworn, deposes and says:

My name is Anwar Sultan. I am over the age of nineteen (19) and I have personal knowledge of the facts set forth in this affidavit.

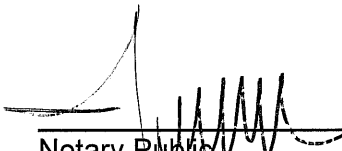
I am the manager and operator of Zona Rosa Night Club. The testimony in this affidavit is offered in such capacity and as part of my job responsibilities in the regular and ordinary course of business. In the Fall of 2007, I received notice that I needed to pay for Zona Rosa's liquor license. I immediately visited the clerk's office and attempted to deliver a check for that purpose. I was told by the City Clerk, Ms. Deborah Orange, that she could accept my check. She did not explain why. I returned to City Hall in December 2007, near Christmas time, and saw Ms. Orange again and she again refused to take my check without explanation. In January I returned to City Hall once again and again attempted to pay for Zona Rosa's license. This time, Ms. Orange told me that she could not accept payment and could not issue the license. Again, she did not explain

why. On this third visit I asked Ms. Orange to make a written note about the City's refusal to accept payment for my license. She did so and a copy of her handwritten note is attached to this affidavit and incorporated herein.

Further the affiant saith not.

  
\_\_\_\_\_  
Affiant

Sworn to and subscribed before me  
this 24 day of February, 2008.

  
\_\_\_\_\_  
Notary Public  
My Commission Expires: 8/15/11

I cannot sell  
you a license at  
this time.

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